



South Coast
Air Quality Management District

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FAXED: AUGUST 17, 2007

August 17, 2007

Mr. Michael Burrows
San Bernardino International Airport Authority
294 South Leland Norton Way, Suite 1
San Bernardino, CA 92408

Dear Mr. Burrows:

**Mitigated Negative Declaration for The San Bernardino Airport Facility
Improvements Project
(July 2007)**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD disagrees with the lead agency's conclusion that the substantial airport operational emissions are not significant, as explained in the following comments. Based on the comments contained herein, the SCAQMD does not believe that the proposed project qualifies for a MND. The air quality analysis should be revised and recirculated in an environmental impact report.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Initial Study. The SCAQMD would be available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith., Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

SS: CB

SBC070725-02
Control Number

Initial Study For The Facility Improvements Project

1. On page IS 49 the lead agency states that, during the construction phase, the project will require 25 delivery trucks of various sizes. Staff is unable to identify emissions for these 25 delivery truck trips in the tables in either Attachment 1 or the URBEMIS output sheets in Attachment 2. Please identify where the emission results are for these mobile sources. Alternatively, if the emissions have not been calculated please calculate and add to the appropriate construction phase emission totals.
2. On page IS 26 the lead agency states that airport operation emissions forecast for both 2008 and 2020 “far exceed the SCAQMD daily emission significance thresholds. However, the lead agency concludes that the substantial emissions from the airport operations are not significant because the airport operations “are regional emissions that would occur regardless of whether the project is approved.” The SCAQMD rejects this rationale and asserts that it not only does not comply with the letter of the California Environmental Quality Act, it is not consistent with the spirit of the law. It is irrelevant whether or not airport emissions would occur elsewhere in the region. With the construction of the facilities at the SBIA, the lead agency needs to account for the air quality impacts from the project it is proposing. This is important because of the requirement for implementing mitigation measures to reduce significant adverse impacts to the maximum extent feasible (see comment #3). Further, the location of the proposed airport’s emissions will now affect a different set of local sensitive receptors (see comments #4, #5, and #6).

Emissions such as those generated by the proposed project are of great concern to the SCAQMD because federal emissions sources, such as airplanes, are essentially unregulated compared to stationary sources in the district. Further, as time goes on, for some criteria pollutants airport emissions become a greater part of the total inventory. For example, according to the 2007 AQMP, in 2005 NO_x emissions from aircraft operations comprised about two percent of the annual inventory (15.4 tons per day out of a total inventory of 1030 tons per day). By 2010 NO_x emissions from aircraft operations increase to almost four percent and by the year 2020 NO_x emissions from airport operations comprise approximately 7.5 percent of the total inventory.

Consequently, the SCAQMD believes that airport emissions should be deemed significant and an environmental impact report should be prepared and circulated for public review and comment.

3. Because the lead agency concludes that emissions from airport operations are not significant, the lead agency offers two extremely weak operational mitigation measures. The 2007 AQMP concluded that substantial emissions reductions from all sources are necessary. Without aggressive measures to reduce emissions, particularly of NO_x, SO_x, VOCs, and particulate matter, attaining the federal eight-hour ozone standard by 2023 and the PM_{2.5} standard by 2014 will be very

difficult. Because of the magnitude of the significant adverse emissions from airport operations for the proposed project, the lead agency should require mitigation measures, including, but not limited to the following measures.

- a. The lead agency should modify mitigation measure III-10 on page IS 27 to require electrification, batteries, compressed natural gas, or their equivalent.
- b. The lead agency should ensure that gate-provided electricity is provided to all aircraft parked at passenger gates and that all aircraft use gate-provided electricity in lieu of engine operation of aircraft or mobile ground auxiliary power units (APUs).
- c. The lead agency should conduct an assessment of operations at passenger loading areas for the purpose of determining whether electrification of these areas is feasible. The assessment should include, but is not limited to, inventory utilization, operations, technological trends and capital and maintenance costs. If the assessment determines electrification is feasible, establish time frame for electrifying 100 percent of the operations.
- d. The lead agency should ensure that all cargo operation areas are equipped and able to provide electricity sufficient for aircraft needs.
- e. The lead agency should ensure that gate-provided electricity is provided to all aircraft parked at cargo operation areas and that all aircraft use airport-provided electricity in lieu of engine operation of aircraft or mobile ground APUs.
- f. The lead agency should conduct an assessment of operations at cargo operation areas for the purpose of determining whether electrification of these areas is feasible. The assessment should include, but is not limited to, inventory utilization, operations, technological trends and capital and maintenance costs. If the assessment determines electrification is feasible, establish time frame for electrifying 100 percent of the operations.
- g. The lead agency should conduct an assessment of operations at airport hangers for the purpose of determining whether electrification of these areas is feasible. The assessment should include, but is not limited to, inventory utilization, operations, technological trends and capital and maintenance costs. If the assessment determines electrification is feasible, establish time frame for electrifying 100 percent of the airport hangers.
- h. The lead agency should establish measures to reduce emissions from on-road heavy-vehicle traffic related to airport operations, including, but not limited to the following measures:

- Establish an incentive program to replace, repower, or retrofit on-road heavy-duty vehicles that service or make deliveries to and from the airport;
 - Establish an incentive program to retrofit on-road heavy-duty diesel vehicles that service or make deliveries to and from the airport with particulate filters and oxidation catalysts;
 - Establish a centralized delivery system alternative-fueled vehicles or lowest emitting vehicles in that vehicle class, to reduce trips of delivery trucks on airport roadways;
 - Contractual requirements with airport contractors regarding emission reductions from on-road vehicle operations at the airport.
- i. The lead agency should establish appropriate and sufficient infrastructure for providing alternative fuel to alternative fuel vehicles to meet all requests for alternative fuels from contractors or others that use the airport.
 - j. The lead agency should support efforts to place a hydrogen fuel cell system for electricity generation at or near the airport. The fuel cell system should meet or exceed CARB 2007 distributed generation certification standards.
 - k. The lead agency should support efforts to encourage the airlines and petroleum industries to embark on a study to promote the use of jet fuels that minimize air pollution emissions from airplane engines.
 - l. Mitigation measure III-6 on page IS 23 should also be applied to any on-road heavy-duty vehicles that service or make deliveries to and from the airport during the operation phase of the project
 - m. For additional mitigation measures for the lead agency's consideration, refer to the following URL:
http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.
 - n. Additional mitigation measures for consideration include, but are not limited to, the following:
 - o. Install light-colored roofing materials to deflect heat and conserve energy.
 - p. Install solar panels on roofs to supply electricity for air-conditioning.
 - q. Install high energy-efficient appliances such as water heaters, refrigerators, furnaces and boiler units.
 - r. Install automatic lighting occupant sensors on/off controls.

- s. Install energy-efficient street lighting.
4. Aircraft emissions are potentially substantial sources of toxic air contaminants. However, the lead agency did not prepare a health risk assessment (HRA). The SCAQMD, therefore, requests that the lead agency prepare an HRA aircraft emissions and include the results in the recommended EIR to be prepared in place of the current MND.
5. Based on the fleet characteristics shown in the URBEMIS output sheets and the total number of vehicle trips from the project by 2020, the proposed project has the potential to generate over 500 on-road diesel vehicle trips per day. Diesel exhaust particulate matter has been classified as a carcinogen by CARB, a mobile source HRA should also be prepared for the proposed project. Guidance for such an analysis can be found on the SCAQMD's CEQA web pages at the following internet address:
http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. The results of the mobile source HRA should be included in the recommended EIR to be prepared in place of the current MND.
6. Consistent with the SCAQMD's environmental justice program and policies, the SCAQMD recommends that the lead agency also evaluate localized air quality impacts to nearby sensitive receptors. SCAQMD staff recommends that for this project and for future projects, the lead agency undertake the localized analysis to ensure that all feasible measures are implemented to protect the health of nearby sensitive receptors. The methodology for conducting the localized significance thresholds analysis can be found on the SCAQMD website at:
www.aqmd.gov/ceqa/handbook/LST/LST.html.

Note that localized Impacts analysis should be done for both construction and operation and there are two corresponding look-up tables for that as well.